



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

November 6, 2012

STEPHEN RENNA, TREASURER  
COMMERCIAL REAL ESTATE FINANCE COUNCIL  
PAC  
30 BROAD STREET 28TH FLOOR  
NEW YORK CITY, NY 10004

**Response Due Date**  
**12/11/2012**

IDENTIFICATION NUMBER: C00411173

REFERENCE: JULY QUARTERLY REPORT (04/01/2012 - 06/30/2012)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Your report(s) was not signed by the treasurer or designated agent listed on your Statement of Organization (FEC Form 1). Please amend your report(s) by providing the signature of an individual that is authorized to sign the report(s). (2 U.S.C. §434(a)(1) and 11 CFR §104.14(a) and (d)) If a new treasurer has been appointed, please file an amended Statement of Organization or a letter (if not an electronic filer) to reflect this change.
2. A review of the reports filed by your committee indicates that your committee received one or more transfers from another Committee (see attached) which has not been disclosed on their report(s) of receipts and disbursements. Please clarify if the contribution(s) was received from the disclosed donor's federal account and amend your report(s) if necessary. (11 CFR §104.3(b))
3. Schedule B of your report (see attached) discloses one or more contributions which appear to exceed the limits set forth in the Act. 2 U.S.C. §441a(a) prohibits a multicandidate committee and its affiliates from making a contribution to a candidate for federal office in excess of \$5,000 per election.

If any apparently excessive contribution in question was incompletely or incorrectly disclosed, you should amend your original report with clarifying information.

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If any contribution you made exceeds the limits, you must request a refund of the excessive amount or provide a written authorization for a redesignation of the contribution pursuant to 11 CFR §110.2(b) within 60 days of the treasurer's receipt.

If the foregoing conditions for redesignations were not met within 60 days of the treasurer's receipt, your committee must obtain a refund of the excessive amount. (11 CFR §103.3(b)(1) and (3))

Please inform the Commission of your corrective action immediately in writing and provide a photocopy of the refund or redesignation request sent to the recipient committee(s). In addition, any refunds should be disclosed on Schedule A supporting Line 16 of the report covering the period during which they are received. Any redesignations should be disclosed as memo entries on Schedule B supporting Line 23 of the report covering the period during which the redesignation is made. (11 CFR §110.1(b))

Although the Commission may take further legal action regarding the excessive contribution(s), your prompt action in obtaining a refund and/or redesignating the contribution(s) will be taken into consideration.

- For your information and consideration when preparing future filings, Schedule B supporting Line 23 of your report discloses contributions to federal candidates for which no election designation has been provided. Commission regulations encourage committees making contributions to federal candidates to designate their contributions in writing for a particular election. Contributions not designated for a particular election will be attributed to the next election for Federal office in which the candidate is participating. (11 CFR §§ 110.1(b)(2) and 110.2(b)(2)) For future filings, please include election designation(s) if applicable.

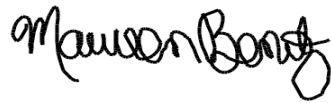
**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

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Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1147.

Sincerely,

A handwritten signature in black ink, appearing to read "Maureen Benitz". The signature is written in a cursive, flowing style.

Maureen Benitz  
Sr. Campaign Finance & Reviewing Analyst  
Reports Analysis Division

**Excessive, Prohibited, and Impermissible Contributions****COMMERCIAL REAL ESTATE FINANCE COUNCIL PAC (C00411173)****Contribution Not Disclosed by Donor Committee**

<b>Contributor Name</b>	<b>Date</b>	<b>Amount</b>	<b>Report</b>
FEDERAL BIPARTISAN VOLUNTARY PUBLIC AFFAIRS COMMITTEE OF THE PNC FINANCIAL SERVICES GROUP,	4/5/12	\$2,500.00	2012 July Quarterly

**Excessive Contributions to a Committee/Candidate Committee**

<b>Recipient Name</b>	<b>Date</b>	<b>Amount</b>	<b>Election</b>	<b>Report</b>
ROYCE CAMPAIGN COMMITTEE	4/7/11	\$1,000.00	P2012*	2011 Mid-Year
ROYCE CAMPAIGN COMMITTEE	6/10/11	\$1,000.00	P2012*	2011 Mid-Year
ROYCE CAMPAIGN COMMITTEE	12/22/11	\$1,000.00	P2012*	2011 Year-End
ROYCE CAMPAIGN COMMITTEE	5/25/12	\$1,000.00	P2012*	2012 July Quarterly
ROYCE CAMPAIGN COMMITTEE	5/25/12	\$2,000.00	P2012*	2012 July Quarterly
BOB CORKER FOR SENATE 2012	10/3/11	\$2,500.00	P2012*	2011 Year-End
BOB CORKER FOR SENATE 2012	12/22/11	\$1,000.00	P2012*	2011 Year-End
BOB CORKER FOR SENATE 2012	12/22/11	\$1,000.00	P2012*	2011 Year-End
BOB CORKER FOR SENATE 2012	6/29/12	\$2,500.00	P2012*	2012 July Quarterly

\*Schedule B of your report does not disclose an election designation for this contribution. Therefore, this contribution has been attributed to the next scheduled Federal election for this candidate, the 2012 Primary (11 CFR §110.2(b)(ii)).